

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

U.S. MAGISTRATE COURT
JSH - SDTX
FILED

MAR 14 2014 DF

David J. Bradley, Clerk
Laredo Division

United States of America)

v.)

Cristina LARA)

Case No. 5:14 mj 368 - 1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 02/20/2014 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. 844(e)

Offense Description

Use of Telephone to make a Threat to Destroy Any Building, Vehicle, and
Other Real and Personal Property by Any Explosive

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Complainant's signature

Gregory Scott Bostic, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

3/17/14

Judge's signature

City and state:

Laredo, Texas

J. Scott Hacker, United States Magistrate Judge

Printed name and title

ATTACHMENT A

I, Gregory Scott Bostic, being duly sworn, depose and state as follows:

1. I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation. I have been employed as a Special Agent of the FBI for four years. I am currently assigned to the Laredo Resident Agency, Joint Terrorism Task Force, working primarily cases involving terrorism and other national security related violations. I have worked on numerous federal criminal investigations with other agents, police officers, and law enforcement personnel who have extensive criminal investigative experience and training. As a federal agent, I am authorized to investigate violations of law of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

2. The statements in this affidavit are based in part on information provided by Special Agents of the FBI, other federal law enforcement officers assigned to this investigation and certain non-law enforcement individuals.

3. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that defendant Cristina LARA has engaged in actions in violation of Title 18, United States Code, Section 844(e) Interstate Threat (Bomb Threat).

Defendant's Actions

4. On February 20, 2014, at approximately 7:20pm, Cristina LARA, utilized telephone number (956) 796-3835 and dialed telephone number (956) 523-6000 which is operated by the United States Department of Justice, Drug Enforcement Administration. Cristina LARA left a five second voice-mail stating "I'm going to blow up your office, you fucking assholes".

5. FBI investigation revealed telephone number (956) 796-3835 is operated by the Laredo Medical Center, located at 1700 East Saunders Street, Laredo, Texas 78041. Contact with the Laredo Medical Center determined that telephone number (956) 796-3835 is assigned to a specific phone located at the Patient Information Desk located within Laredo Medical Center.


6. Laredo Medical Center provided Closed Circuit Television recording of the Patient Information Desk showing Cristina LARA utilizing the telephone with the assigned number of (956) 796-3835 at the same time as the Bomb Threat made to the telephone number assigned to the Drug Enforcement Administration.

7. On March 03, 2014, at approximately 7:45pm, a non-custodial interview was conducted with Cristina LARA wherein she admitted to making the Bomb Threat against the Drug Enforcement Administration.

Conclusion

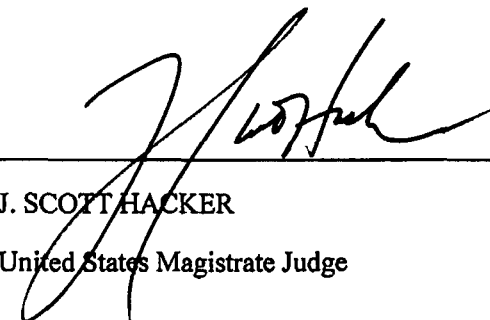
8. Based upon the above information, there is probable cause to believe that Cristina LARA has acted in violation of Title 18, United States Code, Section 844(e), Use of Telephone to make a Threat to Destroy Any Building, Vehicle, and Other Real and Personal Property by Any Explosive.

9. Based upon the foregoing, this Affiant respectfully requests that this Court issue a warrant for the arrest of Cristina LARA.



Gregory Scott Bostic
Special Agent, Federal Bureau of Investigation

Subscribed and sworn to before me on this 17 day of March, 2014 at 2:30 P.M. a.m./p.m. (P)



J. SCOTT HACKER
United States Magistrate Judge